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10 *Plaintiffs' Interim Co-Lead Class Counsel*

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12 UNITED STATES DISTRICT COURT

13 NORTHERN DISTRICT OF CALIFORNIA

14  
15 JOHN PRUTSMAN, AMIRA MARTZ,  
16 SIMCHA RINGEL, NAIOMI MARDEN,  
ALANA BALAGOT, CORINNE  
17 WARREN, SUNNY LAI, AND DAVID  
KLEIN, INDIVIDUALLY AND ON  
18 BEHALF OF ALL OTHERS SIMILARLY  
SITUATED,

19 PLAINTIFFS,  
20 VS.

21 NONSTOP ADMINISTRATION AND  
INSURANCE SERVICES, INC.,  
22 INCLUSIVE,

23 DEFENDANT.

**CASE NO. 3:23-CV-01131-RFL**

**STIPULATION RE: PROPOSED SECOND  
EXTENSION OF TIME TO FILE MOTION  
FOR PRELIMINARY APPROVAL OF CLASS  
ACTION SETTLEMENT; [PROPOSED]  
ORDER**

Judge: Hon. Rita F. Lin

1 Plaintiffs John Prutsman, Amira Martz, Simcha Ringel, Naiomi Marden, Alana Balagot,  
2 Corrine Warren Sunny Lai, and David Klein, (hereinafter “Plaintiffs”), and Defendant Nonstop  
3 Administration and Insurance Services, Inc., (hereinafter “Defendant” or “Nonstop”), collectively  
4 referred to as “the Parties”, hereby stipulate, subject to the Court’s agreement, to extend the  
5 deadline for Plaintiffs to file their Motion for Preliminary Approval of Class Action Settlement,  
6 and in support thereof state as follows:

7 WHEREAS, on June 6, 2024, the Parties conducted a full-day mediation before the well-  
8 respected mediator Bennet G. Picker of Stradley Ronan and after extensive negotiations,  
9 eventually reached a class wide settlement in principle;

10 WHEREAS, on June 27, 2024 the Parties filed a Joint Case Management Statement and  
11 Notice of Settlement and requested forty-five (45) days for Plaintiffs to file their Motion for  
12 Preliminary Approval (ECF No. 92) and on July 1, 2024 the Court vacated the Case Management  
13 Conference set for July 3, 2024 and further ordered that the deadline for Plaintiffs to file their  
14 Motion and a status update regarding the third-party claims against Conor Fitzpatrick be set for  
15 August 12, 2024 (ECF No. 93);

16 WHEREAS, the Parties have been mutually working together to finalize the settlement  
17 agreement and accompanying papers, and to select a settlement administrator to oversee the notice  
18 and claims procedure;

19 WHEREAS, the Parties requested and the Court granted a fourteen (14) day extension of  
20 time to finalize the agreement and for Plaintiffs’ to draft their Motion for Preliminary Approval  
21 once the agreement has been finalized and the settlement administrator selected (ECF Nos. 95-  
22 96); and

23 WHEREAS, since that time the Parties have selected a settlement administrator and  
24 finalized the settlement and motion for preliminary approval and are in the process of having the  
25 settlement agreement executed by Plaintiffs and are now requesting a second extension of time to  
26 fully execute the settlement agreement, subject to Court approval;

27 NOW THEREFORE, subject to the Court’s approval and Order, it is stipulated by and  
28 between the parties, through their respective counsel of record, that Plaintiffs’ deadline to file their

1 Motion for Preliminary Approval be enlarged by an additional fourteen (14) days or until  
2 September 13, 2024.

3 **IT IS SO STIPULATED.**

4 Dated: August 26, 2024

**COLE & VAN NOTE**

6 By: /s/ Scott Edward Cole  
7 Scott Edward Cole, Esq.

8 Dated: August 26, 2024

**MILBERG COLEMAN BRYSON  
PHILLIPS GROSSMAN, PLLC**

10 By: /s/ Gary M. Klinger  
11 Gary M. Klinger, Esq.

12 *Plaintiffs' Interim Co-Lead Class Counsel*

13 Dated: August 26, 2024

**CIPRIANI & WERNER PC**

14 By: /s/ Jill H. Fertel  
15 Jill H. Fertel, Esq.

16  
17 *Counsel for Defendant*

**ORDER**

**THE PARTIES HAVING STIPULATED, AND GOOD CAUSE APPEARING**, the Court hereby enters its Order extending Plaintiffs' deadline to file their Motion for Preliminary Approval and the deadline for the Parties to file a status update regarding the third-party claims against Conor Fitzpatrick be enlarged by fourteen (14) days, or on or before September 13, 2024.

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_, 2024

\_\_\_\_\_  
Hon. Rita F. Lin  
United States District Court for the Northern  
District of California